

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

PAUL CHRISTENSEN,

Plaintiff,

v.

No. 1:15-cv-00134-KG-LF

FINANCIAL CREDIT SERVICE, INC.
d/b/a ARA, INC.
d/b/a ASSET RECOVERY ASSOCIATES,

Defendant.

PLAINTIFF'S PROPOSED SECOND SUPPLEMENTAL JURY INSTRUCTIONS

Plaintiff, through counsel, hereby submits his second supplemental proposed jury instructions, pursuant to the Court's request.

Respectfully submitted,

FEFERMAN & WARREN, Attorneys for Plaintiff

/s/ Nicholas H. Mattision

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INSTRUCTION NO. ____
(Statement of the case)

This is a case about illegal debt collection activities by the Defendant, Financial Credit Services, which is also called “Asset Recovery Associates” or “ARA, Inc.” In May of 2014, the Defendant made a debt collection call to the Plaintiff, Paul Christensen. The Defendant used threats and false statements to collect a debt that the Defendant had no legal right to collect. During the call, the Defendant obtained Mr. Christensen’s bank account information and withdrew \$2,875.75 from Mr. Christensen’s account. Mr. Christensen alleges that he should be awarded actual, statutory, and punitive damages for the Defendant’s actions. Today, you will hear from Mr. Christensen and other witnesses. The Defendant has chosen not to participate in this case, so you will not hear from the Defendant. At the end of the trial, you will be asked to determine the appropriate amount of damages to award to Mr. Christensen.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I served a copy of Plaintiff's Second Amended Proposed Jury Instructions via first class mail, postage prepaid, to Financial Credit Service, Inc. d/b/a ARA, Inc., d/b/a Asset Recovery Associates, c/o Mario Bianchi, 1919 S. Highland Ave St. 225A, Lombard, IL 60148, on April 20, 2016.

/s/ Nicholas H. Mattison

Nicholas H. Mattison